

DENTONS US LLP  
601 SOUTH FIGUEROA STREET, SUITE 2500  
LOS ANGELES, CALIFORNIA 90017-5704  
213 623 9300

1 BETY JAVIDZAD (SBN 240598)  
2 bety.javidzad@dentons.com  
3 SAMANTHA FAHR (SBN 299409)  
4 samantha.fahr@dentons.com  
5 POOJA L. SHAH (SBN 330550)  
6 pooja.l.shah@dentons.com  
7 DENTONS US LLP  
8 601 South Figueroa Street, Suite 2500  
9 Los Angeles, California 90017-5704  
10 Tel: 213 623 9300 / Fax: 213 623 9924

11 MICHAEL GEHRET (SBN 247869)  
12 mike.gehret@dentons.com  
13 TRINITY JORDAN (*Pro Hac Vice*)  
14 trinity.jordan@dentons.com  
15 JORDAN WESTGATE (*Pro Hac Vice*)  
16 jordan.westgate@dentons.com  
17 DENTONS DURHAM JONES & PINEGAR P.C.  
18 111 South Main Street, Suite 2400  
19 Salt Lake City, Utah 84111-2184  
20 Tel: 801 415 3000

21 Attorneys for Defendant  
22 ELITE CREATORS LLC

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

29 N.Z., R.M., B.L., S.M., and A.L.,  
30 individually and on behalf of themselves  
31 and all others similarly situated,

32 Plaintiffs,  
33 v.  
34 FENIX INTERNATIONAL LIMITED,  
35 FENIX INTERNET LLC, BOSS  
36 BADDIES LLC, MOXY  
37 MANAGEMENT, UNRULY AGENCY  
38 LLC (also d/b/a DYSRPT AGENCY),  
39 BEHAVE AGENCY LLC, A.S.H.  
40 AGENCY, CONTENT X, INC., VERGE  
41 AGENCY, INC., AND ELITE  
42 CREATORS LLC,

43 Defendants.

44 Case No. 8:24-cv-01655-FWS-SSC  
45  
46 DEFENDANT ELITE CREATORS,  
47 LLC'S NOTICE OF MOTION  
48 AND MOTION TO DISMISS

49 Date: January 30, 2025  
50 Time: 10:00 a.m.  
51 Crtrm: 10D  
52 Judge: Hon. Fred W. Slaughter

53 Complaint Served: 8/05/2024

1 **TO THE COURT, DEFENDANT, AND THEIR ATTORNEYS OF RECORD:**

2       **PLEASE TAKE NOTICE** that on January 30, 2025, at 10:00 a.m., or as soon  
3 thereafter as the matter may be heard in Courtroom 10D of the above-entitled Court,  
4 located at Ronald Reagan Federal Building and U.S. Courthouse, 411 West 4th  
5 Street, Room 1053, Santa Ana, California 92701-4516, Defendant Elite Creators  
6 LLC (“Creators Inc.” or “Defendant”), through its counsel, will and hereby does  
7 respectfully move this Court pursuant to Fed. R. Civ. P. 12(b)(6) for an order  
8 dismissing Plaintiffs’ Complaint in its entirety for failure to state a claim upon which  
9 relief can be granted.

10       Pursuant to L.R. 7-3, this motion is made following the conference of counsel,  
11 which took place on October 18, 2024 via teleconference.

12       This Motion is based on this Notice, and the accompanying Memorandum of  
13 Points and Authorities, the pleadings and papers on file in this action, and such other  
14 matters as the Court may take judicial notice or consider relevant.

16 Dated: October 25, 2024

Respectfully submitted,

DENTONS US LLP

18 By: /s/ Michael Gehret  
19 Michael Gehret  
20 Bety Javidzad  
21 Trinity Jordan  
Jordan Westgate  
Samantha Fahr  
Pooja L. Shah

22 Attorneys for Defendant  
23 ELITE CREATORS, LLC

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